

STATE OF SOUTH CAROLINA

(Caption of Case)
IN RE:

South Carolina Electric & Gas Company's Request
for Approval of Demand Side Management Plan
Including a Demand Side Management Rate Rider
and Portfolio of Energy Efficiency

218848
BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DUE
SA
9-1-09
9:00

COVER SHEET

DOCKET

NUMBER: 2009 - 261 - E

(Please type or print)

Submitted by: E. Wade Mullins, III

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

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August 31, 2009

AUTHOR'S E-MAIL:
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VIA HAND DELIVERY

The Honorable Charles L.A. Terreni
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

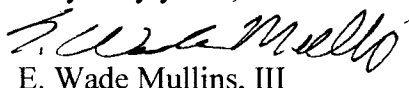
**RE: Application of South Carolina Electric and Gas Company for the
Establishment and Approval of DSM Programs and Rate Rider
Docket No. 2009-261-E
Motion of CMC Steel South Carolina to Amend the Schedule**

Dear Mr. Terreni:

Enclosed for filing please find the original and ten (10) copies of the **Motion of CMC Steel South Carolina to Amend the Schedule** in the above-referenced matter. I have also enclosed two extra copies of the Motion and would appreciate you file stamping the extra copies and returning to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards, I am

Very truly yours,



E. Wade Mullins, III

EWM/rdd

Enclosures

cc: Belton T. Zeigler, Esquire (w/enc.)
Catherine D. Taylor, Esquire (w/enc.)
Frank Knapp, Jr., Esquire (w/enc.)
J. Blanding Holman, IV, Esquire (w/enc.)
K. Chad Burgess, Esquire (w/enc.)
Lee E. Dixon, Esquire (w/enc.)

Mitchell Willoughby, Esquire (w/enc.)
Robert Guild, Esquire (w/enc.)
Scott Elliott, Esquire (w/enc.)
Shannon B. Hudson, Esquire (w/enc.)
Damon E. Xenopoulos, Esquire (w/enc.)

**BEFORE THE
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

IN THE MATTER OF:

**South Carolina Electric & Gas
Company's Request for Approval of
Demand Side Management Plan
Including a Demand Side Management
Rate Rider and Portfolio of Energy
Efficiency Programs**

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Docket No. 2009-261-E

MOTION OF CMC STEEL SOUTH CAROLINA TO AMEND THE SCHEDULE

On June 30, 2009, South Carolina Electric & Gas ("SCE&G") filed an application in this docket ("Application") proposing various energy efficiency programs and energy conservation programs. On July 6, 2009, CMC Steel South Carolina ("CMC Steel" or "CMC") filed a petition to intervene in this docket.

In its Application, SCE&G states that the programs that it is proposing to adopt a "suite of programs". SCE&G further requested that the Commission approve a rate rider to allow it to recover the costs incurred under the DSM programs and an incentive consistent with S.C. Code Ann. § 58-37-20, where the amount of the rate rider would be adjusted annually. The proposed rider would allow SCE&G to recover *inter alia*: (1) SCE&G's costs; (2) an incentive return; and (3) SCE&G's "lost net margin revenue."

CMC's Motion to Amend the Current Schedule

SCE&G is asking for broad discretionary authority in this docket to select, modify, and change the proposed programs and incentives. Approval of SCE&G's application may have far reaching implications for SCE&G's customers. Accordingly intervenors should be allowed adequate time to give serious consideration to all aspects

of SCE&G's proposal, including time to evaluate the potential rate impacts that would result from adoption of SCE&G's proposal.

Under the current case schedule, SCE&G's testimony was due on August 27, 2009 and intervenors' testimony is due just two weeks later on September 10th. CMC Steel hereby moves to amend the schedule in this docket to allow intervenors more time to review SCE&G's testimony and to prepare their own testimony. In addition, there appear to be no compelling reasons not to allow intervenors additional time to file testimony.¹

WHEREFORE, CMC Steel requests that the schedule in this case be modified such that intervenors' direct testimony is due no earlier than October 8th, 2009.

Respectfully submitted,



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Attorneys for CMC Steel South Carolina

¹ Also of relevance, CMC's expert Dr. Dennis W. Goins, filed testimony before the Virginia State Corporation Commission in Case No. PUE-2009-00039, and that commission has scheduled a hearing in that case for October 1, 2009 (the same date that this Commission scheduled a hearing in this case).

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Docket No. 2009-261-E

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of August, 2009, I served the **Motion of CMC Steel South Carolina to Amend the Schedule** by regular mail, with sufficient postage affixed thereto and return address clearly marked, to the following addresses:

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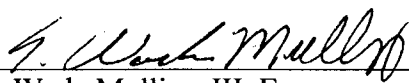
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